

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JULIO ALBERTO SANTOS	:	VIOLATION: 8 U.S.C. § 1326(a), (b)(2)
a/k/a/ Roberto Figueroa	:	(Illegal re-entry to the United States after
	:	deportation - 1 count)
		(Notice of Prior Conviction)

I N D I C T M E N T

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about September 7, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

JULIO ALBERTO SANTOS,
a/k/a Roberto Figueroa,

an alien who had previously been deported from the United States on or about July 6, 2000, was found in the United States, having knowingly and unlawfully re-entered the United States without first applying to the Attorney General of the United States or his successor, the Secretary for Homeland Security (Title 6, United States Code, Sections 202(3), (4) and 557), for permission to reapply for admission, and without receiving in response the express consent of the Attorney General or his successor to reapply for admission.

In violation of Title 8, United States Code, Section 1326(a), (b)(2).

NOTICE OF PRIOR CONVICTION

THE GRAND JURY FURTHER CHARGES THAT:

Defendant JULIO ALBERTO SANTOS committed the offense charged in Count 1 of this Indictment after having been convicted in a court of the Commonwealth of Pennsylvania of aggravated felonies, that is, possession with intent to deliver a controlled substance, Philadelphia Court of Common Pleas, DC # 98-24-023520, and possession with intent to deliver a controlled substance, Philadelphia Court of Common Pleas, DC # 99-25-019040.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney